

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

United States District Court  
Southern District of Texas  
FILED

AUG 08 2018

David J. Bradley, Clerk of Court

UNITED STATES OF AMERICA

vs.

CRIMINAL NO.

GARY SHAWN HAYNES, Jr. aka "TSF Gee",  
JAIMIAN RASHAAD SIMS aka "Sauce Lean",  
TABBETHA DESTINY ANN MANGIS,  
and  
KENDRA KIMBALL aka "Karma",  
Defendants.

18CR 455

CRIMINAL INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE  
(Conspiracy to Commit Sex Trafficking)

From on or about October 1, 2017, through November 24, 2017, in the Southern  
District of Texas and elsewhere,

GARY SHAWN HAYNES, Jr. aka "TSF Gee",  
JAIMIAN RASHAAD SIMS aka "Sauce Lean",  
TABBETHA DESTINY ANN MANGIS,

conspired and agreed with each other, and others known and unknown to the Grand Jury, to  
knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport,  
provide, obtain, advertise, maintain, patronize and solicit by any means, and benefited financially  
and by receiving anything of value, from participation in a venture which recruited, enticed,  
harbored, transported, provided, obtained, advertised, maintained, patronized and solicited by any  
means, any persons knowing and in reckless disregard for the fact that means of force, fraud, and  
coercion would be used to cause these persons to engage in commercial sex acts and that the

persons, whom defendants had a reasonable opportunity to observe, had not attained the age of 18 years and that the persons would be caused to engage in commercial sex acts.

**In violation of Title 18, United States Code, Sections 1594(c), 1591(a)(1), (a)(2), (b)(1), (b)(2) and (c).**

**COUNT TWO**  
**(Sex Trafficking of Minors)**

From on or about October 1, 2017, through November 24, 2017, in the Southern District of Texas and elsewhere,

**GARY SHAWN HAYNES, Jr. aka “TSF Gee”,  
JAIMIAN RASHAAD SIMS aka “Sauce Lean”,**

defendants herein, in and affecting interstate and foreign commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, advertised, maintained, patronized and solicited by any means a person, namely a minor female known as Jane Doe, who had attained the age of 14, but was under 18, and benefitted financially and by receiving anything of value from participation in a venture which has engaged in recruiting, enticing, harboring, transporting, providing, obtaining, maintaining, advertising, patronizing and soliciting by any means Jane Doe, knowing and in reckless disregard of the fact that (1) means of force, threats of force, fraud, and coercion, and any combination of such means, would be used to cause Jane Doe to engage in a commercial sex act, and that (2) Jane Doe, whom defendants had a reasonable opportunity to observe, had not attained the age of 18 years and would be caused to engage in a commercial sex.

**In violation of Title 18, United States Code, Section 1591(a), (b), (c) and Section 2.**

**COUNT THREE**

**(Use of an Interstate Facility to Promote Sex Trafficking of a Minor)**

From on or about November 18, 2017, through November 24, 2017, in the Southern District of Texas and elsewhere,

**KENDRA KIMBALL,**

defendant herein, while aiding and abetting others, did willfully use a facility in interstate commerce, namely the Internet, with the intent to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on of an unlawful activity, that is, sex trafficking of a minor in violation of Title 18, United States Code, Section 1591(a), and thereafter performed and attempted to perform an act to promote, manage, establish and carry on, and to facilitate the promotion, management, establishment and carrying on of such unlawful activity.

**In violation of Title 18, United States Code, Section 1952(a)(3) and Section 2.**

A True Bill:

Original Signature on File

Grand Jury Foreperson ✓

RYAN K. PATRICK  
United States Attorney

By:

  
Sherri L. Zack

Assistant United States Attorney  
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